Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of		
Amendment of the Commissions	)	Docket No. 95-55
Rules Concerning the Inspection	)	
of Radio Installations on Large	)	
Cargo, and Small Passenger Ships	)	

Statement of William G. Weisheit

I am William G. Weisheit, Electronic Specialist for Maritime Overseas Corporation. I manage all the electronics equipment, maintenance and communications for our U. S. fleet which consists of 16 vessels. I am a retired U. S. Coast Guard Master Chief Electronics Technician, and since retiring have served in my present position with Maritime Overseas Corporation for 15 years.

I will comment on each of the areas of inquiry:

Present Inspection Process:

No major changes should be made to the telegraph inspection process.

i. Using on air monitoring methods prior to inspecting the vessel will not work. Many vessels are currently being operated under the FCC's general exemption, or a specific exemption, therefore operated without a Radiotelegrapher.

ii. If a vessel is required to carry radio telegraph equipment, all vessels carrying this equipment should be inspected in the same manner. Changing the standards of inspection from one vessel to another depending on what equipment is on board would be confusing and would not serve the stated purpose.

iii. 47 CFR part 80. gives the radio operator or the technician sitting for the inspection, all the information required. Whatever check list the FCC may create will just be an adjunct to what is now in place. It will take time for everyone, inspectors , technicians, and radio operators, to get used to any new procedures. With only three or four years left under the current safety system, changing the inspection processes is an exercise in futility.

iv. Few inspections are done without a preliminary inspection. The radio operator, who is licensed by the commission, operates the station daily, and should be the person to hold responsible for the radio station not being ready for inspection, not the master. Shipping companies must hire "shore side technicians" to assist the Radio Officer with inspections already, yet there are still delays. Insuring that twenty-five year old equipment, utilizing fifty or sixty year old tube technology, works correctly every time is a delicate balancing act. Preliminary inspections already have to be done, some FCC field offices require a service technician go aboard prior to sending an inspector out to the vessel. As long as we have to keep this "tube technology" operating, there will continue to be problems when an inspector gets to the vessel.

Conclusion:

Changing the radiotelegraph inspection significantly, with its short life span (approximately 31/2 years) is an exercise in futility. The FCC's answer to their radio telegraph inspection problems is the same as ours. When the congress changes the statutory requirements of the communications act, and allows U.S. Flag vessels to operate under the GMDSS, these problems will go away.

Future inspection plans:

Inspection of vessels operating under the GMDSS could be done by an engineer, technician or secretary for that matter, from one location, without attending a vessel. This could be backed up by random on board inspections.

i. With modern communications systems, the need to measure frequency, modulation, or output power has dwindled. Operational checks of equipment's would be sufficient to insure the vessel is in compliance. When using SITOR for instance, if a station is 10 cycles off frequency, their ability to communicate with a shore station, or other vessel all but disappears. The satellite systems monitor the quality of the received signals and reject them if they are out of tolerance at all.

ii, iii. As in the preceding paragraph operational checks are all that is needed.

Conclusion:

If a vessel is certified to operate under the GMDSS, the inspection could be as simple as sending the ship a telex on INMARSAT, directing them to supply the inspector with information such as installation date of the ships reserve batteries, serial number of EPIRB, the expiration date of the EPIRB's batteries, and hydrostatic release. If the vessel is in port, the vessel could call your office via the marine VHF radio. The inspector could then have the vessel answer the INMARSAT message via SITOR through any shore station. If the operator at the FCC has an on line telex machine he or she can even have a dialog with the operator on the vessel, asking for additional information if required.

Additionally, the commission could solicit the aid of the shore station that the vessel uses to contact the commission, to call the vessel on DSC, to test the vessels DSC capabilities. Vessels could even be checked while at sea or in port. By testing vessels in this manner the commission would also have a quality check on the operators ability to communicate successfully. The aforementioned checks could also be done randomly as a quality check on the GMDSS system outside of the normal inspection process. This could also be a way of checking compliance of foreign flag vessels operating in U. S. waters, and would be cost effective. By testing just two vessels a day in this manner, one or two persons could do the annual inspections for the entire U. S. fleet.

Private sector Inspections:

Both the private sector and the classification society would be acceptable as an alternative to FCC inspections on GMDSS equipped vessels, as outlined above. For SOLAS inspections of Radio Telegraph equipped vessels an on board inspection would be required.

i. It would not make any difference who did the inspections. GMDSS inspections as outlined above, could be done by a private entity, or the commission. The commission could use a service company to go on board for random quality checks.

ii. If the inspections are to be conducted by a private sector entity, the GMDSS Station inspector should have as a minimum a GMDSS Radio Operator Maintainer License, and the radio telegraph station inspector should hold a Radio Telegraphers License.

iii. The commission could do GMDSS inspections remotely. Since it would take a year or two to setup a system to do the telegraph inspection by another entity, finding an alternative to the telegraph inspection could be a waste of time and energy.

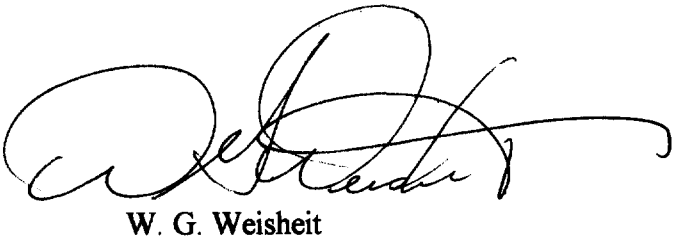
iv. Random on board inspections, should be part of any system, where an FCC inspector would not normally go on board the vessel.

v. I don't think that privatization would affect safety at all. The bottom line is that safety is centered around the operating, and maintenance personnel on board the vessel. These personnel have an intense personnel interest (their own safety) in having their safety and communications equipment operating properly while at sea.

Conclusion:

Using the system outlined in the GMDSS section above, I do not believe on board inspections would be necessary. The use of private sector inspectors would take more people to schedule the inspections , maintain quality control and standards among the non-commission inspectors, then it would for the commission to do the inspections.

For further information, contact William G. Weisheit, Maritime Overseas Corporation, 1927 Westgate Dr., Pearland, Tx, 77584. Telephone number 713-485-9620, Fax 713-485-0494



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